

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MINNESOTA

Cause No: 24-cv-100 SRN/DTS

PRESTON BYRON KNAPP;  
MICHELLE NICHOLE KNAPP.

*Plaintiffs,*

vs.

COMPASS MINNESOTA, LLC;  
DANIEL PHILIP HOLLERMAN (*official and  
individual capacities*).

*Defendants.*

Honorable Judge Susan Richard Nelson  
Magistrate Judge David T. Shultz

NOTICE OF MEET-AND-CONFERENCE; NOTICE  
OF DEFAULT AND MOTION FOR  
DEFAULT JUDGMENT AS TO  
DEFENDANT DANIEL PHILIP  
HOLLERMAN - ONLY

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**NOTICE OF MEET-AND-CONFERENCE STATEMENT**

COME NOW, Plaintiffs', Pro Se, PRESTON BYRON KNAPP and MICHELLE NICHOLE KNAPP, by and through, Preston Byron Knapp and Michelle Nichole Knapp, pursuant to Local Rule 7.1(a), allege and state as follows:

This statement is made to *certify* that the moving party met and conferred with the opposing party, through counsel of record on February 20<sup>th</sup>, 2024, as is the local requirement of this Honorable Court. Further, this notice is to inform this Honorable Court that the parties were unable to reach resolution on any aspect of the Plaintiffs' *Motion for Default Judgment* and therefore ask for the Court's intervention.

**NOTICE OF DEFAULT AND MOTION FOR DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that the Plaintiffs, Preston Byron Knapp, and Michelle Nichole Knapp, hereby move this Honorable Court for the entry of Default and Default Judgment against Defendant Daniel Philip Hollerman, pursuant to Federal Rule of Civil Procedure 55(a) and 55(b).

1. Defendant Daniel Philip Hollerman was duly served with Summons and Complaint on January 22, 2024, as evidenced by the *Notice of Service of Process* and *Affidavit of Service* filed with this Court on February 2<sup>nd</sup>, 2024 (*Id.* at dkt. 9).
2. Counsel for Defendant Daniel Philip Hollerman, Carl E. Christensen and Ryan P. Supple, filed *Notice of Appearance* on January 18, 2024 (*Id.* at dkt. 6), and attorney Robert Kouba filed a *Notice of Appearance* on behalf of the same Defendant on the same day (*Id.* at dkt. 7), which gave this Honorable Court jurisdiction over Defendant.
3. More than 21 days have elapsed since the service of *Summons* and *Complaint* upon Defendant Daniel Philip Hollerman, and Defendant has failed to plead or otherwise defend as provided by the Federal Rules of Civil Procedure.
4. Defendant's counsel has not requested Leave of this Court or petitioned for an Enlargement of Time. There is no excusable neglect on the part of Defendant or Defendant's counsel to justify the delay.
5. Therefore, Defendant Daniel Philip Hollerman is in default and has forfeited the right to contest liability.

Accordingly, Plaintiffs request that this Court grant the Motion for Default Judgment in the amount of **Twenty-Million Dollars (\$20,000,000.00)**, as detailed in the attached Affidavit of Facts.

Dated: February 20<sup>th</sup>, 2024

RESPECTFULLY SUBMITTED,

BY: /s/ Preston Byron Knapp  
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/s/ Michelle Nichole Knapp  
Michelle Nichole Knapp  
Plaintiff, Pro Se  
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### **Certificate of Service**

Plaintiffs certify that on February 20<sup>th</sup>, 2024, the foregoing *Notice of Service of Process* was filed with the Clerk of this Court via ECF. We further certify that, on the same date, the same document was served on Counsel listed below via electronic email.

**Distribution:**

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